

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AMERICAN NEIGHBORHOOD
MORTGAGE ACCEPTANCE
COMPANY, LLC b/b/a
ANNIEMAC HOME
MORTGAGE,

Plaintiff,

v.

MONA LEE EDICK, DESPINA
NOVAKIDOU and STACEY
LEMMAGE,

Defendants.

Civil Action No. 1:25-cv-01563-RMB-SAK

NOTICE OF MOTION

TO: Connor M. Mannion, Esq.
Cole Schotz, PC
25 Main Street
Hackensack, NJ 07601

PLEASE TAKE NOTICE that Defendants, Mona Edick, Despina Novakidou and Stacey Lemmage, through their undersigned attorney, shall move before the Honorable Renée Marie Bumb on June 16, 2025 for an Order dismissing Counts III (Fraud) and IV (Conspiracy) of Plaintiff's Complaint; dismissing Defendant Lemmage for failure to perfect service; and dismiss Defendant Novakidou and Lemmage for lack of personal jurisdiction.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendants will rely on the attached brief and Lemmage certification.

THE CHILLA BUSINESS COUNSEL, LLC

s/ James Prusinowski

James T. Prusinowski, Esq. (JP0729)

jprusinowski@chillalegal.com

268 South Street

Morristown, NJ 07960

Attorneys for Defendants

Date: May 13, 2025